

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOSHUA DWANE BACON,
Plaintiff, *pro se*,

v.

LUZERNE COUNTY, et al.,
Defendants,

| No. 3:23-CV-01699-RDM-CA
| [JUDGE MARIANI]

| Filed via U.S. Mail on July 29, 2024

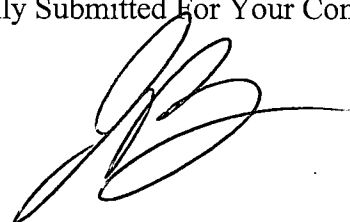
FILED
SCRANTON
AUG 02 2024
PER DJ
DEPUTY CLERK

MOTION REQUESTING PERMISSION TO CONTACT ANOTHER INCARCERATED WITNESS

Plaintiff, JOSHUA DWANE BACON, acting *pro se*, comes before this Honorable Court and respectfully represents the following:

1. Plaintiff has determined that Mr. Dana GANJEH was an inmate at Luzerne County Correctional Facility during the relevant times in this complaint. Mr. Dana GANJEH lived on the same housing unit as the Plaintiff. Mr. GANJEH was a witness to the assault by KEZIAH. Mr. GANJEH's testimony is also relevant to Plaintiff's pending Third Circuit appeal on ~~the~~ conditions of confinement in Luzerne County Correctional Facility's RHU, as he spent considerable time in their RHU.
2. Mr. Dana GANJEH is currently serving a sentence of life without parole at SCI-Greene, under state number QN8636.
3. Plaintiff is acting *pro se* and does not have counsel or an investigator to contact Mr. GANJEH.
4. Plaintiff believes that Mr. GANJEH's testimony could be extremely valuable to his prosecution of this suit.
5. Plaintiff did speak with Ms. Allison Murphy, the superintendent's assistant at SCI-Chester where he is currently housed, regarding this request to correspond with Mr. GANJEH via legal mail, and Ms. Murphy informed me that the facility would require a court order in order to permit me to correspond with another inmate in a correctional facility by mail.
6. WHEREFORE, Plaintiff requests that this Honorable Court order Ms. Gina Clark, Superintendent at SCI-Chester, to allow Plaintiff Joshua Bacon QN6521 to initiate and maintain contact with inmate Dana Ganjeh QN8636 via secure legal mail for the purposes of obtaining testimony. Additionally, Plaintiff requests that this Honorable Court order the Superintendent of SCI-Greene to allow Mr. Dana Ganjeh to send and receive legal mail from inmate Joshua Bacon QN6521.

Respectfully Submitted For Your Consideration,



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOSHUA DWANE BACON,
Plaintiff, *pro se*,

v.

LUZERNE COUNTY, et al.,
Defendants,

| No. 3:23-CV-01699-RDM-CA

| [JUDGE MARIANI]

| Filed via U.S. Mail on July 29, 2024

CERTIFICATE OF SERVICE

I, JOSHUA DWANE BACON, hereby certify that on Monday, July 29, 2024, I served a copy of the foregoing **MOTION REQUESTING PERMISSION TO CONTACT ANOTHER INCARCERATED WITNESS** upon the persons indicated below via U.S. Mail:

United States District Court For the Middle District of Pennsylvania

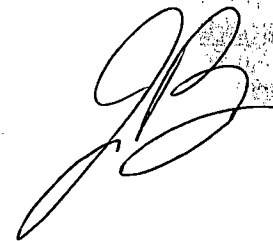
235 N. Washington Ave

PO Box 1148

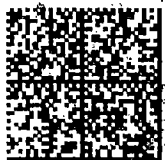
Scranton, PA 18501

Dougherty, Levanthal, & Price LLP was NOT served with a copy of this motion.

Respectfully Submitted For Your Consideration,

 Josh Bacon

US POSTAGE  PITNEY BOWES



ZIP 19013 \$ 000.69⁰
02 4W
0000359303 JUL 30 2024

LEGAL MAIL

SCF-CHS
X-RAY

Smart Communications/PADOC

SCF-CHS

Name Bacon

Number QNG521

PO Box 33028

St Petersburg FL 33733

United States District Court
Middle District of PA
235 N Washington Ave
1148
Scranton, PA 18501

RECEIVED
SCRANTON

AUG 02 2024

PER  DEPUTY CLERK

1850135001 C77D

